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July 9, 2008

VIA FACSIMILE (2 Pages)
212.805. 6304

Honorable Paul A. Crotty
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: CNAN Group S.p.a. v. Hassan
Ali Rice Export Co. d/b/a/ Igen
Sea Shipping - 08 CV 1201 (PAC)
Our Ref: 8974

Dear Judge Crotty:

Our law firm represents plaintiff CNAN Group S.p.a. in the above-captioned Rule B maritime attachment action in which defendant Hassan Ali Rice Export Co. ("HAREC") has moved to vacate an attachment effected at Habib Bank Ltd. on April 4, 2008. Defendant HAREC is located in Karachi, Pakistan. As a result, we are obtaining evidence from Karachi to submit as part of plaintiff's papers in opposition to the motion, which is due to be filed today. We were on pace to file plaintiff's opposition papers until this morning when a power outage in Karachi prevented us from obtaining two declarations on a timely basis. In addition, a declaration being obtained from a solicitor in London has been delayed because his secretary is out ill today. (This has not been a particularly good day for us.)

We explained these last-minute logistical problems to our adversary, who has graciously consented to allowing us to file plaintiff's opposition to the motion to vacate tomorrow, July 10th, provided defendant may file its reply papers on Tuesday,

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Hon. Paul A. Crotty

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July 15th, rather than Monday, July 14th. Plaintiff has no objection to the alteration in the schedule on which defendant bases its consent.

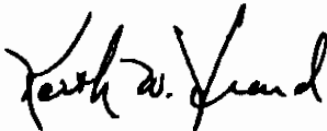
Accordingly, we hereby request that plaintiff be permitted to file its papers in opposition to the motion to vacate on Thursday, July 10th, and that defendant be allowed to file its reply papers on Tuesday, July 15th. The parties are in agreement that, as far as they are concerned, the date and time for oral argument (2:45 p.m. on Thursday, July 17th) need not be changed.

(It would appear that Your Honor's Individual Practices may require submission of a Revised Scheduling Order in this situation but that is complicated by the fact that there was no original Scheduling Order, just a Calendar Entry on June 20th. If a Revised Scheduling Order is needed, it would be greatly appreciated if someone from chambers can contact the undersigned at (212) 354-3185 and let us know.)

We very much appreciate the Court's consideration of this request.

Respectfully submitted,

BURKE & PARSONS



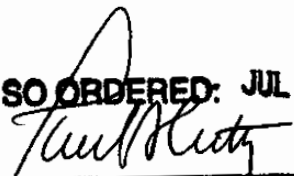
Keith W. Heard
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Enclosures (1)

cc: Lennon Murphy & Lennon
Attn: Kevin Lennon, Esq.
Anne LeVasseur, Esq.
Facsimile: (212) 490-6070



★ SO ORDERED: JUL 09 2008

HON. PAUL A. CROTTY
UNITED STATES DISTRICT JUDGE